

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

21-cr-10104 (PBS)

VLADISLAV KLYUSHIN,
a/k/a “Vladislav Kliushin”
IVAN ERMAKOV,
a/k/a “Ivan Yermakov,” and
NIKOLAI RUMIANTCEV,
a/k/a “Nikolay Rumyantsev,”

Defendants

ASSENTED-TO MOTION FOR ADDITIONAL TIME TO RESPOND

With the assent of counsel for the defendant, the government respectfully requests that it be permitted to respond to defendant’s motion for acquittal (Docket No. 222) on or before March 31, 2023. As grounds for the motion, the government submits that overseas travel on other matters has limited the undersigned’s ability to respond within the 14 days provided for by Local Rule. Counsel for the defendant has assented to the requested extension.

The government accordingly requests that it be permitted to respond to defendant’s motion (Docket No. 222) on or before March 31, 2023.

Respectfully submitted,

RACHAEL S. ROLLINS
United States Attorney

By: /s/Seth B. Kosto

SETH B. KOSTO
STEPHEN E. FRANK
Assistant U.S. Attorneys

Date: March 27, 2023

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the government's assented-to motion for additional time to respond to defendant's motion for acquittal will be served through Electronic Case Filing on counsel of record.

/s/Seth B. Kosto
SETH B. KOSTO
Assistant United States Attorney

March 27, 2023